



Veronica Morris, PhD

Elaine Malkin

BOARD OF DIRECTORS

Chanda Hagen

Bradley W. Morris, MA

1651 SANDPIPER DR  
 ROCK HILL SC 29732  
 USA  
 (510) 367-4267  
 psdinfo@gmail.com  
 www.psychdogpartners.org

**3/4/16 DRAFT:** Proposed airline form for service dog handlers requesting accommodation [form updated from 2/9/16 only to simplify language; no substantive change]

*If you are traveling with a service dog on your flight, the Department of Transportation requires you to fill out this form for accommodation. Airlines are required to make this form available at ticket counters and boarding/gate desks. If you knowingly lie on this form, according to federal law (CFR § X) you can be punished by fines up to \$5000 and/or imprisoned for up to 30 days. Airlines may also then choose to ban you from flying for up to five years. Note: If your dog is a service dog but becomes clearly disruptive or uncontrolled, you may lose your accommodations and be subject to penalties, such as pet fees, etc. for the current flight and flights for the next month.*

Questions about you

**Disability:** Are you a person with a disability (or responsible for handling the dog to assist someone in your party who has a disability)?

**YES** **NO**



**Active training:** On your trip, are you training this dog to assist a person with a disability?



**Delivery of trained dog:** Are you a dog trainer delivering this dog to someone whose disability the dog is expected to mitigate through successfully trained behaviors?



Questions about the dog's training

**Public access training:** Has the dog undergone successful public access training in different environments so the dog will not be disruptive on the flight and at the airport?



**Disability assistance training:** Has the dog undergone or is the dog undergoing recognition and response training to relieve the symptoms or effects of a person's disability?



\_\_\_\_\_  
 Printed name of handler

\_\_\_\_\_  
 Signature or mark

\_\_\_\_\_  
 Name of animal

\_\_\_\_\_  
 Date

Received/filed by: \_\_\_\_\_

\_\_\_\_\_  
 Printed name of airline employee

\_\_\_\_\_  
 Signature or mark

\_\_\_\_\_  
 Date

*\*Training documentation/certification/ID and medical documentation must not be required for access with a service dog. Please see the guidance brief associated with this form for more information.*

**DRAFT (proposal):** Guidance brief regarding proposed airline form for service dog handlers requesting accommodation

In alignment with the Americans with Disabilities Act (ADA) regulations but under separate authority, service dog users are allowed accommodations under the Air Carrier Access Act (ACAA) regulations. A service dog is a dog individually trained to do work or perform tasks to mitigate a specific person's disability, as well as trained to behave in public and remain under control. There are service dogs for many types of disabilities, including but not limited to diabetic alert dogs, psychiatric service dogs, guide dogs, and hearing alert dogs. The mere presence of a dog providing emotional support does not qualify the dog as a service dog, even if the person has a disability.

*Training requirements*

Service dogs must be trained through a process comprising public access training and disability mitigation training. Public access training, as it pertains here, involves successfully training the dog in a variety of environments that are very likely to result in the dog behaving in the advanced environments of a busy airport and the cabin of a plane in flight. Disability mitigation training involves training the dog to reliably recognize and respond to either commands or changes in the person or environment, in order to perform particular disability-mitigating tasks or work.

**The service dog user or handler may not be asked to provide training documentation, certification, or service dog ID to gain accommodation**, nor can they be required to retain such documentation on their person. Similarly, medical documentation must not be requested and cannot be used as a barrier to the access of everyday goods and services by people with disabilities. However, service dog handlers seeking any accommodation associated with their service dog in an airplane cabin must complete the form to gain that accommodation.

Individuals may save time or stress by filling out their portion of the form before arriving at the airport. Airlines, through their ticket counter personnel, are encouraged to retain the form in a file upon check-in and designate "service dog" on the handler's ticket as an indication the form has been completed. These steps will both shift liability from the airline to the handler (should a dispute arise) and ease passenger flow and accommodation requests down the line. Passengers requesting service dog accommodation who wish to bypass the ticket counter must still fill out their portion of the form and have airline personnel complete it at their airline's gate/boarding desk in advance of the boarding call.

While service dog handlers are encouraged to mark their dogs as service dogs as a clarifying courtesy, such markings do nothing to grant access and are not required.

*Access at security checkpoints and sterile areas before flight*

The form is required only for flight accommodations, may be completed at the boarding gate before passenger loading begins, and the service dog handler is not expected to carry a copy. Consequently, the form is not used to gain access or accommodation at security checkpoints or in businesses within the "sterile" areas of the airport (past security checkpoints).

Instead, if it is not obvious that the dog is a service dog, personnel may ask only two questions to ascertain whether it is a service dog or advanced service dog in training:

- (1) Is this dog trained to behave in airports?
- (2) Is this dog trained or training to assist with an individual's disability?

If the answers are "yes" and the dog does not exhibit disruptive behavior, the person is entitled to access with the dog the same as they would be with a wheelchair. This includes in shops and restaurants.

If the answers are not both "yes", or the dog exhibits disruptive behavior (see below), access with the dog is not required under ACAA regulations.

### *Disruptive behavior*

Regardless of whether the handler has completed the form or how well-behaved the dog has been in other environments, airline and TSA personnel are able to work in conjunction to revoke special accommodations if obviously uncontrolled disruptive behavior is observed. This includes repeatedly jumping on people, uncontrolled continuous barking, being malodorous to the point at which a similarly odored person would not be allowed on board, running amok, showing clearly aggressive behavior, etc.

Note that since airline and TSA personnel are not qualified as experts on dog behavior, these conditions should be blatantly disruptive to merit action. However, when the conditions are blatantly disruptive, to maintain a safe and comfortable environment for all passengers, it is incumbent upon personnel to take action. Those involved are encouraged to record any proceedings leading up to and during such action.

Depending on the severity and location of the disruptive behavior, the airline or TSA personnel may respond to recorded or reliably witnessed disruptions by: having a pet fee charged for that portion of the flight, requiring that the dog only be allowed to be flown as a pet up to one month from the incident, or pursuing legal action against the handler under CFR X.

### *Special types of service dog teams*

- Some service dog teams are triads, in which one person is responsible for handling the service dog, but the service dog assists someone else in the party who has a disability.
- An individual with a service dog in training that is advanced in its training (enough to behave in airport and flying environments) can travel with the advanced service dog in training in order to further the dog's training.
- A dog trainer may also fly with a dog that has successfully completed its service dog training if transporting that dog to the person with a disability the dog is expected to mitigate.

In any of the cases described, the dog handler must fit in one of the first three categories on the form, as well as attest to the dog's training in the final questions. While it is up to airlines whether to allow pets or emotional support animals under any conditions, since these are not presumed to be trained specifically to reliably handle the advanced airport and flight environments with a justified assurance of public safety, airlines are not required to grant special access accommodations to pets or emotional support animals.

In accordance with the natures of both ADA regulations and the special restrictions of flight environments, only dogs are acceptable as service animals meriting accommodation on flights under ACAA regulations.

### *Nature of accommodations*

Service dog handlers and advanced service dog in training handlers qualified via the form and non-disruptive behavior cannot be required to pay any additional fees to travel with the service dog, and must be allowed to travel with the dog in the cabin. They are also entitled to seating accommodation with reasonably adequate legroom (to include the dog) within the barriered area of the plane that includes their ticket class.

A handler must keep the dog under control, and the handler is solely responsible for the care of the dog. Dogs are not entitled to sit on any airplane or airport seats, though may rest on the lap of the person with a disability if needed for work or task performance.

**Psychiatric Service Dogs Partners' purpose is to promote the mental health of people using service dogs for psychiatric disabilities by educating, advocating, providing expertise, facilitating peer support, and promoting responsible service dog training and handling.**